

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CLIFFORD CARROLL,

Plaintiff,

v.

Civil Action No.:

FEDEX CUSTOM CRITICAL,
INC., ABC CORPS. #1-4, AND
JOHN DOES
#1-4,

Defendants.

NOTICE OF REMOVAL

TO: PLAINTIFF'S COUNSEL

Cody M. Allen, Esq.
Allison Whitfield, Esq.
Morgan & Morgan Atlanta, PLLC
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PLEASE TAKE NOTICE that the Defendant, FedEx Custom Critical, Inc., by and through its undersigned counsel of record, pursuant to U.S.C. §§ 1441 and 1332, and hereby files this Notice of Removal of this action from the State Court for the County of Fulton, State of Georgia, where it is now pending, to the United States District Court for the Northern District of Georgia, Atlanta Division.

In support of this Notice of Removal, the Defendant has filed contemporaneously herewith its Brief in Support of Removal and accompanying Exhibits, including the pleadings and entire record of this matter.

WHEREFORE, the Defendant respectfully requests that this Court enter an Order removing this action from the State Court for the County of DeKalb, State of Georgia, where it is now pending, to the United States District Court for the Northern District of Georgia, Atlanta Division.

This the 26th day of April, 2023.

Shires, Peake & Gottlieb, LLC

/s/ Kevin T. Shires
Kevin T. Shires, Esq.
Georgia Bar No.: 643290
Loren A. Rafferty, Esq.
Georgia Bar No.: 678355

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing document upon all parties to this matter by:

x Electronically filing this document with CM/ECF which sends notice via that system to all parties and counsel pursuant to O.C.G.A. § 9-11-5(F) and/or U.S.C.R. 36.16(E)

x Electronically serving this document via email pursuant to O.C.G.A. § 9-11-5 (F) and/or U.S.C.R. 36.16(E) as follows:

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This 26th day of April, 2023.

Shires, Peake & Gottlieb, LLC

/s/ Kevin T. Shires
Kevin T. Shires
State Bar No.: 643290

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